PS 8 Rev. 10/2005

## UNITED STATES DISTRICT COURT for the EASTERN DISTRICT OF PENNSYLVANIA

U.S.A. vs. Shahidul Gaffar

Docket No. 2:20CR00392

## Petition for Action on Conditions of Pretrial Release

COMES NOW, Phillip Harris, U.S. Pretrial Services Officer, presenting an official report upon the conduct of Shahidul Gaffar, who was placed under pretrial release supervision by the Honorable Joshua D. Wolson sitting in the Court at Philadelphia, on November 18, 2020, under the following conditions:

- 1. Report to Pretrial Services as directed.
- 2. Submit to GPS electronic monitoring at 16 Hunt Club Drive, Collegeville, PA. Home Detention. You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer.
- 3. Surrender/Do not obtain a passport.
- 4. Surrender/Do not obtain a firearm.
- 5. Travel restricted to the Eastern District of Pennsylvania.
- 6. Maintain address at 16 Hunt Club Drive, Collegeville, PA.
- Defendant is prohibited from entering a point of egress without Court approval. This includes and is not limited to airports and train stations.
- 8. Defendant shall surrender the passports of her children to pretrial services.
- Defendant will cooperate with Pretrial Services to allow monitoring of all electronic devices at the discretion of the Pretrial Officer.

Respectfully presenting petition for action of Court and for cause as follows:

- The defendant's wife and co-defendant, Nabila Khan, was a stay-at-home mother who cared for the couple's four children. She is now in custody serving a 24-month prison sentence. The defendant is now responsible for caring for the children by himself.
- 2. With the added responsibilities of caring for his children and maintaining his business, the defendant has requested more flexibility in reference to his travel in the community while submitting to location monitoring. The defendant has maintained compliance with the location monitoring program since his release on bail. Mr. Gaffar will continue to be monitored by location monitoring technology while he is in the community.
- Neither Defense Counsel for the defendant, Elizabeth Toplin, nor AUSA Sarah Wolfe, object to allowing the defendant to submit to a curfew set by Pretrial Services.

PRAYING THAT THE COURT WILL ORDER: The defendant shall submit to a curfew set by Pretrial Services.

Case 2:20-cr-00392-JDW Document 79 Filed 11/18/21 Page 2 of 2

ORDER OF COURT

Considered and ordered this <u>18th</u> day of <u>November</u>, 2021 and ordered filed and made a part of the records in the above case.

The Monorable Joshua D. Wolson

U.S. District Judge

I declare under penalty of perjury that the foregoing is true and correct.

Phillip Harris

U.S. Pretrial Services Officer

Place: Philadelphia

Date: November 16, 2021